

MELINDA HAAG (CABN 132612)  
United States Attorney

J. DOUGLAS WILSON (DCBN 412811)  
Chief, Criminal Division

DANIEL P. TALBERT (SBN OH 0084088)  
Special Assistant United States Attorney  
450 Golden Gate Ave., Box 36055  
San Francisco, California 94102  
Telephone: (415) 436-7200  
Fax: (415) 436-7234  
E-Mail: Daniel.Talbert@usdoj.gov

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,	)	Case No.: CR 13-00585 MAG
	)	
Plaintiff,	)	<b>STIPULATION AND <del>PROPOSED</del></b>
v.	)	<b>ORDER TO EXCLUDE TIME BETWEEN</b>
	)	<b>SEPTEMBER 18, 2013, AND OCTOBER</b>
EMELITA GANNABAN CHUA,	)	<b>15, 2013</b>
	)	
Defendant.	)	
	)	

The defendant, EMELITA GANNABAN CHUA, provisionally represented by EDWARD HU, Assistant Federal Public Defender, and the government, represented by DANIEL P. TALBERT, Special Assistant United States Attorney, stipulate that time should be excluded from September 18, 2013, to October 15, 2013 from the Speedy Trial Clock.

The parties appeared before the Court on September 18, 2013. The parties jointly requested to appear before the Court on October 15, 2013 for a status conference. Based on the parties' request, the matter was continued to October 15, 2013 at 11:00 am before Judge Laporte.

The parties now jointly request that time be excluded from the Speedy Trial Clock from September 18, 2013, to October 15, 2013. The parties request that time be excluded based upon the

STIP. TO EXCLUDE TIME, CR 13-00585 MAG

1 need for effective preparation of counsels, pursuant to Title 18 United States Code, Section  
2 3161(h)(7)(B)(iv). The parties are attempting to negotiate a possible resolution of this matter.

3 DATED: September 18, 2013

Respectfully submitted,

4 MELINDA HAAG  
5 United States Attorney

6 By s/ Daniel P. Talbert  
7 DANIEL P. TALBERT  
8 Special Assistant U.S. Attorney

9 DATED: September 18, 2013

10 BY s/ Edward Hu  
11 EDWARD HU  
12 Assistant Federal Public Defender  
13 (as authorized by email)

24  
25  
26  
27 STIP. TO EXCLUDE TIME, CR 13-00585 MAG

~~PROPOSED~~ ORDER

Based upon the representations of counsels and for good cause shown, the Court finds that failing to exclude the time between September 18, 2013, and October 15, 2013 would unreasonably deny counsels the reasonable time necessary for effective preparation, taking into account the exercise of due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by excluding the time between September 18, 2013, and October 15, 2013 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, IT IS HEREBY ORDERED that the time between September 18, 2013, and October 15, 2013 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A) and (B)(iv).

DATED: 10/7/13

  
HON. ELIZABETH D. LAPORTE  
United States Magistrate Judge